

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

SAMNANG AM,

Defendant.

Crim. No. 05-cr-10226-RWZ

**JOINT MOTION TO EXCLUDE TIME FROM
FEBRUARY 9, 2007, THROUGH MAY 14, 2007 UNDER SPEEDY TRIAL ACT**

The United States of America (the “government”) and the defendant, Samnang Am (“Am”), respectfully move this Honorable Court to exclude the time from February 9, 2007 to and including May 14, 2007 under the Speedy Trial Act.

In support of this motion, the parties jointly state that this Honorable Court conducted a Telephone Conference in this matter on February 9, 2007, at which counsel for the defendant requested additional time to address the possibility of vacating one or more of the defendant’s prior convictions and to determine whether this matter may be resolved short of a trial. The government did not oppose that request. Both parties assented to the scheduling of a Trial on May 14, 2007, at 9:00 a.m., and agreed that the time allotted for this requested continuance – *i.e.*, from February 9, 2007 to and including May 14, 2007 should be excluded under the Speedy Trial Act. The Court directed the parties to file a joint motion based on the foregoing agreement, which serves the ends of justice and outweighs the interests of the public and the defendant in a speedy trial, rendering the exclusion warranted under 18 U.S.C. § 3161(h)(8)(A).

WHEREFORE, the parties jointly request that the time from February 9, 2007 to and including May 14, 2007, be excluded from the time within which this case must be tried under the Speedy Trial Act.

Dated: February 9, 2007

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

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SAMNANG AM,
By his attorney,

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